

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

ALAMEDA RESEARCH LLC, : Chapter 11
: Case No. 22-11066 (JTD)

Debtor.

—x—

In re

ALAMEDA RESEARCH LTD, : Chapter 11
: Case No. 22-11067 (JTD)

Debtor.

—x—

In re

FTX TRADING LTD., : Chapter 11
: Case No. 22-11068 (JTD)

Debtor.

—x—

In re

ALAMEDA RESEARCH HOLDINGS INC., : Chapter 11
: Case No. 22-11069 (JTD)

Debtor.

—x—

In re

CLIFTON BAY INVESTMENTS LLC, : Chapter 11
: Case No. 22-11070 (JTD)

Debtor.

—x—

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| In re | : | |
| WEST REALM SHIRES SERVICES INC., | : | Chapter 11 |
| | : | Case No. 22-11071 (JTD) |
| Debtor. | : | |
| | X | |
| In re | : | |
| WEST REALM SHIRES FINANCIAL SERVICES | : | Chapter 11 |
| INC., | : | Case No. 22-11072 (JTD) |
| Debtor. | : | |
| | X | |
| In re | : | |
| LEDGER HOLDINGS INC., | : | Chapter 11 |
| | : | Case No. 22-11073 (JTD) |
| Debtor. | : | |
| | X | |
| In re | : | |
| FTX JAPAN HOLDINGS K.K., | : | Chapter 11 |
| | : | Case No. 22-11074 (JTD) |
| Debtor. | : | |
| | X | |
| In re | : | |
| FTX EUROPE AG, | : | Chapter 11 |
| | : | Case No. 22-11075 (JTD) |
| Debtor. | : | |
| | X | |

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| In re | : | |
| FTX PROPERTY HOLDINGS LTD, | : | Chapter 11 |
| | : | Case No. 22-11076 (JTD) |
| | : | |
| | Debtor. | |
| | -----x | |
| In re | : | |
| LT BASKETS LTD., | : | Chapter 11 |
| | : | Case No. 22-11077 (JTD) |
| | : | |
| | Debtor. | |
| | -----x | |
| In re | : | |
| ALAMEDA TR LTD, | : | Chapter 11 |
| | : | Case No. 22-11078 (JTD) |
| | : | |
| | Debtor. | |
| | -----x | |
| In re | : | |
| ALLSTON WAY LTD, | : | Chapter 11 |
| | : | Case No. 22-11079 (JTD) |
| | : | |
| | Debtor. | |
| | -----x | |
| In re | : | |
| ANALISYA PTE LTD, | : | Chapter 11 |
| | : | Case No. 22-11080 (JTD) |
| | : | |
| | Debtor. | |
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| In re | : | |
| ATLANTIS TECHNOLOGY LTD., | : | Chapter 11 |
| | : | Case No. 22-11081 (JTD) |
| | : | |
| Debtor. | : | |
| | X | |
| In re | : | |
| BANCROFT WAY LTD, | : | Chapter 11 |
| | : | Case No. 22-11082 (JTD) |
| | : | |
| Debtor. | : | |
| | X | |
| In re | : | |
| BLUE RIDGE LTD, | : | Chapter 11 |
| | : | Case No. 22-11083 (JTD) |
| | : | |
| Debtor. | : | |
| | X | |
| In re | : | |
| CARDINAL VENTURES LTD, | : | Chapter 11 |
| | : | Case No. 22-11084 (JTD) |
| | : | |
| Debtor. | : | |
| | X | |
| In re | : | |
| CEDAR BAY LTD, | : | Chapter 11 |
| | : | Case No. 22-11085 (JTD) |
| | : | |
| Debtor. | : | |
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| In re | : | |
| LIQUID SECURITIES SINGAPORE PTE LTD, | : | Chapter 11 |
| | : | Case No. 22-11086 (JTD) |
| | : | |
| Debtor. | : | |
| | X | |
| In re | : | |
| MACLAURIN INVESTMENTS LTD., | : | Chapter 11 |
| | : | Case No. 22-11087 (JTD) |
| | : | |
| Debtor. | : | |
| | X | |
| In re | : | |
| MANGROVE CAY LTD, | : | Chapter 11 |
| | : | Case No. 22-11088 (JTD) |
| | : | |
| Debtor. | : | |
| | X | |
| In re | : | |
| PAPER BIRD INC, | : | Chapter 11 |
| | : | Case No. 22-11089 (JTD) |
| | : | |
| Debtor. | : | |
| | X | |
| In re | : | |
| PIONEER STREET INC., | : | Chapter 11 |
| | : | Case No. 22-11090 (JTD) |
| | : | |
| Debtor. | : | |
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| In re | : | |
| QUOINE INDIA PTE LTD, | : | Chapter 11 |
| | : | Case No. 22-11091 (JTD) |
| Debtor. | : | |
| | X | |
| In re | : | |
| QUOINE VIETNAM CO. LTD, | : | Chapter 11 |
| | : | Case No. 22-11092 (JTD) |
| Debtor. | : | |
| | X | |
| In re | : | |
| SNG INVESTMENTS YATIRIM VE DANIŞMANLIK ANONİM ŞİRKETİ, | : | Chapter 11 |
| | : | Case No. 22-11093 (JTD) |
| Debtor. | : | |
| | X | |
| In re | : | |
| STRATEGY ARK COLLECTIVE LTD., | : | Chapter 11 |
| | : | Case No. 22-11094 (JTD) |
| Debtor. | : | |
| | X | |
| In re | : | |
| TECHNOLOGY SERVICES BAHAMAS LIMITED, | : | Chapter 11 |
| | : | Case No. 22-11095 (JTD) |
| Debtor. | : | |
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| In re | : | |
| VERDANT CANYON CAPITAL LLC, | : | Chapter 11 |
| | : | Case No. 22-11096 (JTD) |
| Debtor. | : | |
| | x | |
| In re | : | |
| WEST INNOVATIVE BARISTA LTD., | : | Chapter 11 |
| | : | Case No. 22-11097 (JTD) |
| Debtor. | : | |
| | x | |
| In re | : | |
| WESTERN CONCORD ENTERPRISES LTD., | : | Chapter 11 |
| | : | Case No. 22-11098 (JTD) |
| Debtor. | : | |
| | x | |
| In re | : | |
| FTX EQUITY RECORD HOLDINGS LTD, | : | Chapter 11 |
| | : | Case No. 22-11099 (JTD) |
| Debtor. | : | |
| | x | |
| In re | : | |
| FTX EXCHANGE FZE, | : | Chapter 11 |
| | : | Case No. 22-11100 (JTD) |
| Debtor. | : | |
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| In re | : | |
| FTX HONG KONG LTD, | : | Chapter 11 |
| | : | Case No. 22-11101 (JTD) |
| Debtor. | : | |
| | x | |
| In re | : | |
| FTX JAPAN K.K., | : | Chapter 11 |
| | : | Case No. 22-11102 (JTD) |
| Debtor. | : | |
| | x | |
| In re | : | |
| FTX JAPAN SERVICES KK, | : | Chapter 11 |
| | : | Case No. 22-11103 (JTD) |
| Debtor. | : | |
| | x | |
| In re | : | |
| ALAMEDA AUS PTY LTD, | : | Chapter 11 |
| | : | Case No. 22-11104 (JTD) |
| Debtor. | : | |
| | x | |
| In re | : | |
| ALAMEDA RESEARCH (BAHAMAS) LTD, | : | Chapter 11 |
| | : | Case No. 22-11105 (JTD) |
| Debtor. | : | |
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| In re | : | |
| ALAMEDA RESEARCH KK, | : | Chapter 11 |
| | : | Case No. 22-11106 (JTD) |
| Debtor. | : | |
| | x | |
| In re | : | |
| ALAMEDA RESEARCH PTE LTD, | : | Chapter 11 |
| | : | Case No. 22-11107 (JTD) |
| Debtor. | : | |
| | x | |
| In re | : | |
| ALAMEDA RESEARCH YANKARI LTD, | : | Chapter 11 |
| | : | Case No. 22-11108 (JTD) |
| Debtor. | : | |
| | x | |
| In re | : | |
| ALAMEDA TR SYSTEMS S. DE R. L., | : | Chapter 11 |
| | : | Case No. 22-11109 (JTD) |
| Debtor. | : | |
| | x | |
| In re | : | |
| BLOCKFOLIO, INC., | : | Chapter 11 |
| | : | Case No. 22-11110 (JTD) |
| Debtor. | : | |
| | x | |

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| In re | : | |
| CLIFTON BAY INVESTMENTS LTD, | : | Chapter 11 |
| | : | Case No. 22-11111 (JTD) |
| Debtor. | : | |
| | x | |
| In re | : | |
| COTTONWOOD GROVE LTD, | : | Chapter 11 |
| | : | Case No. 22-11112 (JTD) |
| Debtor. | : | |
| | x | |
| In re | : | |
| CRYPTO BAHAMAS LLC, | : | Chapter 11 |
| | : | Case No. 22-11113 (JTD) |
| Debtor. | : | |
| | x | |
| In re | : | |
| DEEP CREEK LTD, | : | Chapter 11 |
| | : | Case No. 22-11114 (JTD) |
| Debtor. | : | |
| | x | |
| In re | : | |
| DIGITAL CUSTODY INC., | : | Chapter 11 |
| | : | Case No. 22-11115 (JTD) |
| Debtor. | : | |
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| In re | : | |
| FTX (GIBRALTAR) LTD, | : | Chapter 11 |
| | : | Case No. 22-11116 (JTD) |
| Debtor. | : | |
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| In re | : | |
| FTX CANADA INC, | : | Chapter 11 |
| | : | Case No. 22-11117 (JTD) |
| Debtor. | : | |
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| In re | : | |
| FTX DIGITAL HOLDINGS (SINGAPORE) PTE LTD, | : | Chapter 11 |
| | : | Case No. 22-11118 (JTD) |
| Debtor. | : | |
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| In re | : | |
| FTX PRODUCTS (SINGAPORE) PTE LTD, | : | Chapter 11 |
| | : | Case No. 22-11119 (JTD) |
| Debtor. | : | |
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| In re | : | |
| FTX SERVICES SOLUTIONS LTD., | : | Chapter 11 |
| | : | Case No. 22-11120 (JTD) |
| Debtor. | : | |
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| In re | : | |
| FTX STRUCTURED PRODUCTS AG, | : | Chapter 11 |
| | : | Case No. 22-11122 (JTD) |
| Debtor. | : | |
| | x | |
| In re | : | |
| FTX TRADING GMBH, | : | Chapter 11 |
| | : | Case No. 22-11123 (JTD) |
| Debtor. | : | |
| | x | |
| In re | : | |
| FTX ZUMA LTD, | : | Chapter 11 |
| | : | Case No. 22-11124 (JTD) |
| Debtor. | : | |
| | x | |
| In re | : | |
| GLOBAL COMPASS DYNAMICS LTD., | : | Chapter 11 |
| | : | Case No. 22-11125 (JTD) |
| Debtor. | : | |
| | x | |
| In re | : | |
| GOODMAN INVESTMENTS LTD., | : | Chapter 11 |
| | : | Case No. 22-11126 (JTD) |
| Debtor. | : | |
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| In re | : | |
| HAWAII DIGITAL ASSETS INC., | : | Chapter 11 |
| | : | Case No. 22-11127 (JTD) |
| | : | |
| Debtor. | : | |
| | X | |
| In re | : | |
| INNOVATIA LTD, | : | Chapter 11 |
| | : | Case No. 22-11128 (JTD) |
| | : | |
| Debtor. | : | |
| | X | |
| In re | : | |
| ISLAND BAY VENTURES INC, | : | Chapter 11 |
| | : | Case No. 22-11129 (JTD) |
| | : | |
| Debtor. | : | |
| | X | |
| In re | : | |
| KILLARNEY LAKE INVESTMENTS LTD, | : | Chapter 11 |
| | : | Case No. 22-11131 (JTD) |
| | : | |
| Debtor. | : | |
| | X | |
| In re | : | |
| ZUBR EXCHANGE LTD, | : | Chapter 11 |
| | : | Case No. 22-11132 (JTD) |
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| Debtor. | : | |
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| In re | : | |
| ALAMEDA GLOBAL SERVICES LTD., | : | Chapter 11 |
| | : | Case No. 22-11134 (JTD) |
| Debtor. | : | |
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| In re | : | |
| COTTONWOOD TECHNOLOGIES LTD., | : | Chapter 11 |
| | : | Case No. 22-11136 (JTD) |
| Debtor. | : | |
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| In re | : | |
| DECK TECHNOLOGIES HOLDINGS LLC, | : | Chapter 11 |
| | : | Case No. 22-11138 (JTD) |
| Debtor. | : | |
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| In re | : | |
| DECK TECHNOLOGIES INC., | : | Chapter 11 |
| | : | Case No. 22-11139 (JTD) |
| Debtor. | : | |
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| In re | : | |
| EUCLID WAY LTD, | : | Chapter 11 |
| | : | Case No. 22-11141 (JTD) |
| Debtor. | : | |
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| In re | : | |
| FTX DIGITAL ASSETS LLC, | : | Chapter 11 |
| | : | Case No. 22-11143 (JTD) |
| Debtor. | : | |
| | X | |
| In re | : | |
| FTX EMEA LTD., | : | Chapter 11 |
| | : | Case No. 22-11145 (JTD) |
| Debtor. | : | |
| | X | |
| In re | : | |
| FTX US TRADING, INC., | : | Chapter 11 |
| | : | Case No. 22-11149 (JTD) |
| Debtor. | : | |
| | X | |
| In re | : | |
| HIVE EMPIRE TRADING PTY LTD, | : | Chapter 11 |
| | : | Case No. 22-11150 (JTD) |
| Debtor. | : | |
| | X | |
| In re | : | |
| LIQUID FINANCIAL USA INC., | : | Chapter 11 |
| | : | Case No. 22-11151 (JTD) |
| Debtor. | : | |
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| In re | : | |
| LIQUIDEX LLC, | : | Chapter 11 |
| | : | Case No. 22-11152 (JTD) |
| | : | |
| Debtor. | : | |
| | X | |
| In re | : | |
| NORTH DIMENSION INC., | : | Chapter 11 |
| | : | Case No. 22-11153 (JTD) |
| | : | |
| Debtor. | : | |
| | X | |
| In re | : | |
| NORTH WIRELESS DIMENSION INC., | : | Chapter 11 |
| | : | Case No. 22-11154 (JTD) |
| | : | |
| Debtor. | : | |
| | X | |
| In re | : | |
| LEDGERPRIME BITCOIN YIELD ENHANCEMENT MASTER FUND LP, | : | Chapter 11 |
| | : | Case No. 22-11155 (JTD) |
| | : | |
| Debtor. | : | |
| | X | |
| In re | : | |
| LEDGERPRIME DIGITAL ASSET OPPORTUNITIES FUND, LLC, | : | Chapter 11 |
| | : | Case No. 22-11156 (JTD) |
| | : | |
| Debtor. | : | |
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| In re | : | |
| LEDGERPRIME DIGITAL ASSET OPPORTUNITIES MASTER FUND LP, | : | Chapter 11 |
| | : | Case No. 22-11157 (JTD) |
| Debtor. | : | |
| | X | |
| In re | : | |
| LEDGER PRIME LLC, | : | Chapter 11 |
| | : | Case No. 22-11158 (JTD) |
| Debtor. | : | |
| | X | |
| In re | : | |
| LEDGERPRIME VENTURES, LP, | : | Chapter 11 |
| | : | Case No. 22-11159 (JTD) |
| Debtor. | : | |
| | X | |
| In re | : | |
| NORTH DIMENSION LTD, | : | Chapter 11 |
| | : | Case No. 22-11160 (JTD) |
| Debtor. | : | |
| | X | |
| In re | : | |
| QUOINE PTE LTD, | : | Chapter 11 |
| | : | Case No. 22-11161 (JTD) |
| Debtor. | : | |
| | X | |

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| In re | : | |
| CEDAR GROVE TECHNOLOGY SERVICES, LTD, | : | Chapter 11 |
| | : | Case No. 22-11162 (JTD) |
| | : | |
| Debtor. | : | |
| | X | |
| In re | : | |
| DAAG TRADING, DMCC, | : | Chapter 11 |
| | : | Case No. 22-11163 (JTD) |
| | : | |
| Debtor. | : | |
| | X | |
| In re | : | |
| FTX CERTIFICATES GMBH, | : | Chapter 11 |
| | : | Case No. 22-11164 (JTD) |
| | : | |
| Debtor. | : | |
| | X | |
| In re | : | |
| FTX CRYPTO SERVICES LTD., | : | Chapter 11 |
| | : | Case No. 22-11165 (JTD) |
| | : | |
| Debtor. | : | |
| | X | |
| In re | : | |
| FTX EU LTD., | : | Chapter 11 |
| | : | Case No. 22-11166 (JTD) |
| | : | |
| Debtor. | : | |
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| In re | : | |
| FTX LEND INC., | : | Chapter 11 |
| | : | Case No. 22-11167 (JTD) |
| | : | |
| | Debtor. | |
| | -----x | |
| In re | : | |
| FTX MARKETPLACE, INC., | : | Chapter 11 |
| | : | Case No. 22-11168 (JTD) |
| | : | |
| | Debtor. | |
| | -----x | |
| In re | : | |
| FTX SWITZERLAND GMBH, | : | Chapter 11 |
| | : | Case No. 22-11169 (JTD) |
| | : | |
| | Debtor. | |
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| In re | : | |
| FTX TURKEY TEKNOLOJİ VE TİCARET ANONİM ŞİRKET, | : | Chapter 11 |
| | : | Case No. 22-11170 (JTD) |
| | : | |
| | Debtor. | |
| | -----x | |
| In re | : | |
| FTX US SERVICES, INC., | : | Chapter 11 |
| | : | Case No. 22-11171 (JTD) |
| | : | |
| | Debtor. | |
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| In re | : | |
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| FTX VENTURES LTD, | : | Chapter 11 |
| | : | |
| | : | Case No. 22-11172 (JTD) |
| | : | |
| Debtor. | : | |
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| In re | : | |
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| GG TRADING TERMINAL LTD, | : | Chapter 11 |
| | : | |
| | : | Case No. 22-11173 (JTD) |
| | : | |
| Debtor. | : | |
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| In re | : | |
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| GOOD LUCK GAMES, LLC, | : | Chapter 11 |
| | : | |
| | : | Case No. 22-11174 (JTD) |
| | : | |
| Debtor. | : | |
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| In re | : | |
| | : | |
| HANNAM GROUP INC, | : | Chapter 11 |
| | : | |
| | : | Case No. 22-11175 (JTD) |
| | : | |
| Debtor. | : | |
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| In re | : | |
| | : | |
| HILLTOP TECHNOLOGY SERVICES LLC, | : | Chapter 11 |
| | : | |
| | : | Case No. 22-11176 (JTD) |
| | : | |
| Debtor. | : | |
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In re :

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| LEDGERPRIME BITCOIN YIELD | : | Chapter 11 |
| ENHANCEMENT FUND, LLC, | : | Case No. 22-11177 (JTD) |

Debtor. :

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In re :

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| WEST REALM SHIRES INC., | : | Chapter 11 |
| | : | Case No. 22-11183 (JTD) |

Debtor. :

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ORDER (I) AUTHORIZING JOINT ADMINISTRATION OF THE DEBTORS' CHAPTER 11 CASES AND (II) GRANTING CERTAIN RELATED RELIEF

Upon the motion (the “Motion”)¹ of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), for entry of an order (this “Order”) (a) authorizing joint administration of the Debtors’ Chapter 11 Cases and the consolidation thereof for procedural purposes only and (b) granting certain related relief; this Court having jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Motion in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Motion and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or

¹ Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Motion.

further notice is necessary; and objections (if any) to the Motion having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Motion and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors, their estates, their creditors and all other parties-in-interest; and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. Pursuant to section 105(a) of the Bankruptcy Code, Bankruptcy Rule 1015(b) and Local Rule 1015-1, the above-captioned Chapter 11 Cases are consolidated for procedural purposes only and shall be jointly administered by this Court as Case No. 22-11068 (JTD).
3. The consolidated caption of the jointly administered cases shall read as follows:

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

¹ The last four digits of FTX Trading Ltd.'s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' proposed claims and noticing agent at [•].

4. The foregoing caption satisfies the requirements set forth in section 342(c)(1) of the Bankruptcy Code and Bankruptcy Rules 1005 and 2002(n), or such requirements are hereby otherwise waived.

5. A docket entry shall be made in each of the Debtors' Chapter 11 Cases, other than the docket maintained for the chapter 11 case of FTX Trading Ltd., substantially as follows:

An order has been entered in this case under rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing the procedural consolidation and joint administration of the chapter 11 cases of FTX Trading Ltd. and its affiliated debtors. All further pleadings and other papers shall be filed in, and all further docket entries shall be made in, the docket of FTX Trading Ltd., Case No. 22-11068 (JTD) and such docket should be consulted for all matters affecting this chapter 11 case.

6. One consolidated docket, one file and one consolidated service list shall be maintained by FTX Trading Ltd. and kept by the clerk of the Court with the assistance of the notice and claims agent retained by the Debtors in these Chapter 11 Cases.

7. Nothing contained in the Motion or this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of these Chapter 11 Cases.

8. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

9. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Motion or the implementation of this Order.

Dated: November ___, 2022
Wilmington, Delaware

The Honorable John T. Dorsey
United States Bankruptcy Judge